

Pursuant to the Public Service Commission of South Carolina’s (“Commission”) Order No. 2019-129-H, Intervenor Southern Alliance for Clean Energy (“SACE”) and South Carolina Coastal Conservation League (“CCL”) hereby present the following list of issues for Commission determination in these proceedings to implement the requirements of The Energy Freedom Act, Act No. 62 of 2019.

Variable Integration Charge (VIC) and Embedded Integration Charge (EIC)

1. Have intervenors raised a specter of imprudence regarding Dominion Energy South Carolina's ("DESC") proposed Variable Integration Charge (VIC) and underlying *Cost of Variable Integration Study*?

☐ Yes ☐ No

2. Have intervenors raised a specter of imprudence regarding DESC's proposed Embedded Integration Charge (EIC) and underlying 35% operating reserve "methodology"?

☐ Yes ☐ No

3. Has DESC accounted for "ancillary services *provided by*" small power producers (including those utilizing energy storage equipment), in addition to ancillary services potentially consumed by small power producers, consistent with Act 62 and S.C. Code Ann. § 58-41-20(B)(3)?

☐ Yes ☐ No

4. Has DESC taken any steps to "minimiz[e] the total cost of providing service," including taking efforts to minimize variable energy integration costs, or given this minimization due regard, as required by S.C. Code Ann. § 58-27-865(f)?

☐ Yes ☐ No

5. Has DESC met its burden of proof to show its proposed VIC of \$4.14 per megawatt hour (MWh) “fairly accounts” for costs avoided by the electrical utility or incurred by the electrical utility, including avoided or incurred ancillary services costs as required by Act 62 consistent with PURPA?

☐ Yes ☐ No

6. Has DESC met its burden of proof to show its proposed EIC of approximately \$6.70 per MWh “fully and accurately” reflects the utility’s avoided costs and “fairly accounts” for costs avoided by the electrical utility or incurred by the electrical utility, including avoided or incurred ancillary services costs as required by Act 62 consistent with PURPA?

☐ Yes ☐ No

7. Is it reasonable and consistent with Act 62 and PURPA to approve Office of Regulatory Staff Witness Horii’s alternative VIC and EIC calculation of \$2.39 per MWh?

☐ Yes ☐ No

8. Is it reasonable and consistent with Act 62 and PURPA to approve Solar Business Alliance Witness Burgess’s alternative EIC calculation of \$0.96 per MWh?

☐ Yes ☐ No

9. Is it reasonable and consistent with Act 62 and PURPA to reject DESC's proposed VIC and EIC pending the outcome of the independent integration study pursuant to Section 8 of Act 62 (S.C. Code Ann. § 58-37-60)?

☐ Yes ☐ No

10. Is it reasonable and appropriate for DESC to file for review and comment controlled generator criteria for avoiding the VIC, EIC, or any future integration charges at such time as those charges may be approved by this Commission?

☐ Yes ☐ No

11. Is it commercially reasonable and consistent with Act 62 and PURPA to limit any future integration charges approved by this Commission to apply prospectively only, and to not apply such charges retroactively to PPAs signed prior to such future approval?

☐ Yes ☐ No

12. Is consistent with Act 62 and PURPA for DESC to be required to make a compliance filing that recalculates the Companies' proposed avoided cost rates removing the EIC?

☐ Yes ☐ No

13. Should DESC submit its study methodologies and inputs to an independent technical review and include the results of that review and any revisions in its initial filing in the next avoided cost proceedings, subject to Commission

oversight and stakeholder input, and in coordination with the integration study authorized by S.C. Code Ann. § 58-37-60?

☐ Yes ☐ No

14. To the extent that DESC proposes to impose a VIC or EIC for any other South Carolina renewable energy programs, should the Commission separately consider the appropriateness of those charges in the proceedings to consider and review those separate programs?

☐ Yes ☐ No

Winter-Focused Demand Side Management Programs

15. Is it reasonable and appropriate to require DESC identify and implement cost-effective demand side management programs that address and lower winter peak demand beginning in year 2020?

☐ Yes ☐ No

Resource Plan Optimization

16. Is it reasonable and consistent with Act 62 and FERC Order 69 to require DESC to optimize its resource planning beginning in year 2020?

☐ Yes ☐ No